

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Care One Management, LLC, et al.,

Plaintiffs,

-v-

United Healthcare Workers East, SEIU 1199,
et al.,

Defendants.

Civil Action No. 2:12-cv-06371-
SDW-MAH

**FIRST SUPPLEMENTAL
DECLARATION OF FAARIS
AKREMI IN OPPOSITION
TO PLAINTIFFS' *DAUBERT*
MOTION AND MOTION
IN LIMINE**

I, Faaris Akremi, hereby declare as follows:

1. I am an attorney with the law firm of Bredhoff & Kaiser, PLLC, counsel for Defendants 1199SEIU United Healthcare Workers East; New England Health Care Employees Union, District 1199; and Service Employees International Union. I make this declaration based on my personal knowledge in support of Defendants' Oppositions to Plaintiffs' Motion to Preclude Defendants' Expert Seth Fliegler from Testifying Pursuant to Fed. R. Evid. 702 (*Daubert* Motion) and Motion in Limine to Preclude Defendants from Offering Evidence Relating to Unfair Labor Practice Proceedings (Motion in Limine). ECF Nos. 545, 549.
2. Attached hereto as Exhibits 100–102 are true and correct copies of the following items from the record in the above-referenced matter, including a description of the exhibits which are cited in Defendants' Opposition to Plaintiffs' *Daubert* Motion and the source of each document.*

* Exhibits to this Declaration are numbered continuously with the Exhibits to my initial Declaration in Support of Defendants' *Daubert* Motions and Motions in Limine to Exclude and Limit Certain Evidence, ECF No. 537.

Exhibit Number	Document Description	Source/Cite in Defendants' Opposition
100	Excerpts of Seth Fliegler Deposition Transcript Vol. I dated 11/7/2023 (filed under seal)	Fliegler Tr. Vol. I
101	Excerpts of Seth Fliegler Deposition Transcript Vol. II dated 11/8/2023 (filed under seal)	Fliegler Tr. Vol. II
102	Michael A. Crain et al., <i>Essentials of Forensic Accounting</i> ch. 1 (2016)	Same

3. Attached hereto as Exhibit 103 is a true and correct copy of the following item from the record in the above-referenced matter, including a description of the exhibit that is cited in Defendants' Opposition to Plaintiffs' Motion in Limine and the source of the document.

Exhibit Number	Document Description	Source/Cite in Defendants' Opposition
103	Excerpts of Mary Kay Henry Deposition Transcript dated 6/24/2016	Henry Tr.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: Jan. 6, 2025



Faaris Akremi